



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
US ARMY CHEMICAL MATERIALS AGENCY
TOOELE CHEMICAL AGENT DISPOSAL FACILITY
11620 STARK ROAD
STOCKTON, UTAH 84071

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UTAH DIVISION OF
SOLID & HAZARDOUS WASTE

April 04, 2006

Tooele Chemical Agent Disposal Facility

PM-60197

SUBJECT: Temporary Authorization (TA) Request – Installation of the Multipurpose
Demilitarization Machine (MDM) Froth Collection System

Mr. Dennis Downs, Director
Utah Department of Environmental Quality
Division of Solid and Hazardous Waste
288 North 1460 West
Salt Lake City, Utah 84116-0690

Dear Mr. Downs:

TOCDF requests Temporary Authorization, pursuant to 40 CFR 270.42 (e), to begin construction, installation and testing of a newly-designed Multipurpose Demilitarization Machine (MDM) Froth Collection System prior to the end of “60 days after the submission of the [Class 2 RCRA Modification] request” per §270.42(b)(8).

This request for Temporary Authorization is concurrent with the submittal of the Class 2 RCRA Permit Modification Request TOCDF-MDM-02-0836 “Froth Collection System for MDMs”, which incorporates this system into the Subpart X Miscellaneous Treatment Unit language of Attachment 14 “Miscellaneous Treatment Units”.

§270.42(e)(2)(ii)(A), Activities to be Conducted Under the TA

A Froth Collection System will be installed on each of the three MDMs. The existing pull and drain station stop plate will be removed and a new modified stop plate, with spacers, an air-operated ball valve and miscellaneous parts will be installed and post-installation-tested. No hazardous waste treatment will be performed at the MDMs under the TA.

§270.42(e)(2)(ii)(B), Necessity of the Temporary Authorization

The Froth Collection System will be used during the treatment of Mustard 4.2-inch mortars, per the Class 2 RCRA Permit Modification TOCDF-MDM-02-0836. §270.42(b)(8) implicitly requires that construction (and installation) of the Froth Collection System begins no sooner than 60 days after the Class 2 Modification request is submitted for approval. TOCDF desires to proceed with the installation of the Froth Collection System on each of the MDMs prior to the end of the 60-day post-submittal period in order to reduce the number of

Demilitarization Protective Ensemble (DPE) entries that may be required into the Munition Processing Bay (MPB) if installation proceeds later.

§270.42(e)(2)(ii)(C), Continued Compliance to 40 CFR 264 Standards


The Froth Collection System consists of several parts to be attached to each of the three MDMs, which are permitted Miscellaneous Treatment Units. However, the MDMs will not be used to perform hazardous waste treatment activities under the TA.

§270.42(e)(3)(ii)(E), Objective of the Temporary Authorization

The objective of the Temporary Authorization is to further protect human health by enabling construction activities to proceed in an area of the plant (the MPB) that will be more contaminated at a later date, after the commencement of Mustard ton container processing.

If you have any questions regarding this issue, please contact Ms. Elizabeth A. Lowes at (435) 833-7832 or Mr. Trace Salmon at (435) 833-7428.

Sincerely,



Gary W. McCloskey
EG&G Defense Materials, Inc.
*CERTIFICATION STATEMENT



Thaddeus A. Ryba, Jr.
TOCDF Site Project Manager
*CERTIFICATION STATEMENT

Copies Furnished:

CMA Risk Management Directorate (Mr. Stang)
DCD Risk Management Directorate (Mr. Levi)
TOCDF FO Representative (Ms. Snow)
File